

FILED
IN CLERK'S OFFICE
2025 JUL 18 PM 12:16

IN THE UNITED STATES DISTRICT COURT FOR MASSACHUSETTS

Angela Nails,

Plaintiff,

Vs.

Cause Number

DISTRICT OF MASS.

Staples Copy and Print Store,

And Three Employees, Employees

Corporate Staples Copy & Print

Defendants,

CIVIL LIBILITY DAMAGES COMPLAINT

The civil complaint is Diversity compliant. The Plaintiff is a Georgia Resident and the Defendant Corporation Office Massachusetts. The Subject Jurisdiction Matter is within the District Court jurisdiction. The Damages comes from the face value of the defendant Liability Insurance Policy and the Defendant employee's monthly paycheck. Each of the defendants have engaged in ethical misconduct & Professional misconduct of the defendant Staples Print and Copy Center guidelines and policies of the Staples Store while the Plaintiff was banned from the Staples during the day the Plaintiff was banned is when the Plaintiff encounter behaviors. Each of the Defendants showed their own uncontrollable behaviors and attitudes toward the Plaintiff. The Plaintiff was a customer of five years. The ethical misconduct & Professional misconduct comes from the Defendants expression to get rid of the Plaintiff dismissive away from their duties as described in the job description. The manager's job description is to remain understanding and attend to customer needs and oversee Staple Copy and Print Center employees. The manager was dismissive and challenging a lot of the times and especially on the same day the Plaintiff was banned from Staples Copy and Print Store the Plaintiff was harassed, embarrassed, by a customer assisting the customer are the employees who showed favoritism and unprofessional conduct not appropriate conduct for the situation. After the Plaintiff left the Staples, the defendant called the Police Department. The Staple Store manager, and the Staples Store copy employee present ongoing outburst behaviors on different days and on the same day the Plaintiff was asked to

leave and was told the Plaintiff is banned. Staple Copy & Print male employees both have unprofessional conduct and behaviors were toward Plaintiff harass & misleading direction to the Plaintiff toward helping customers asking the Plaintiff to give a customer assistance than afterwards the employee showed sexually conduct toward the Plaintiff opening his mouth and blowing his own air down the throat of the Plaintiff of the Plaintiff mouth, the Plaintiff pulling away motion not to continue the behavior toward the Plaintiff. Plaintiff turned around the male employee was standing behind the Plaintiff the male employee began sexual connection conduct toward the Plaintiff.

Employees at the Corporate Office would not give the Plaintiff appropriate responses on how to communicate with District and Regional Manager. The employees each are employed at the Staples Office of the President for the Corporate Office. One person gave the Plaintiff a link to email recording of the evidence of the problems that were occurring inside the Staple Copy and Print Store on the same day the Plaintiff was being banned.

The Staple Corporate Office of the President rejected to contact both managers proper willingness to investigate the Staples Store video clip on the date the Plaintiff was banned caused the Plaintiff to contact the Staples Office of the President. The Staple Copy and Print Store, the store manager called Police Department. The Police arrived seeing the Plaintiff sitting inside the Plaintiff black automobile outside of the Staple Store Parking bothering no one after the Plaintiff left the Staple Copy and Print Store. After leaving the Staple Store, the Plaintiff contacted the Police Department. The Plaintiff knows of no justification why Staple Store employees gave the Plaintiff issues and problems making the rash decision from the Staple Store manager employed to make other decision than asking Plaintiffs to leave the Staples Store because of a loud customer harassing the Plaintiff with there the loud confrontation speaking against the Plaintiff

causing the Plaintiff to be disrespected in front of everyone other than the customer and by the Staples manager and other employees while customers feeling the offset of the environment.

The Staples Copy & Print Store banned the Plaintiff from parking inside a parking space in front of the store address 11605 Abercorn Street Suite 100 Savannah, Georgia 31419. The Police Department was called by Staple Store manager and stated the Plaintiff is sitting inside the Plaintiff vehicle in front of the Staples Store shopping Center parking slot.

The manager is not the registered agent of the Largo Plaza Staples Store nor is the manager responsible for asking customers to leave the Staples Store without a good reason. This is why the Plaintiff was shouted at by the Staple Store manager, who was running after the Plaintiff while the Plaintiff was removing herself removed from the Staple Store. The Plaintiff asked for a call to the Plaintiff from the District Manager's and Regional Manager if there was a call to the Plaintiff from the District Manager.

DAMAGES

- (1) Out of Pocket
- (2) Loaded reusable Staple Gift Cards for making copies Plaintiff has spent money on other copy gift cards.
- (3) Mental Disability unstable from the manager and customer making a scene in the Staple Copy and Print Store.
- (4) Misconduct and unmanageable Behaviors Toward Plaintiff from different store employees and one harassing customer.
- (5) Banned Plaintiff from the Stable Copy and Print Center Store Premises without reasonable authority to, manager contacted police and spoke with the Office of the President.

- (6) Corporate Office Employee refused to listen and to Communication with the District and Regional manager of Staple assisting the Plaintiff needs to correct the issues and to dispute the managers and Staple employees angry behavior and uncommon discipline was not able to be resolved the Corporate Office employees continue to refuse the right of the Plaintiff by laws to complain moving up the chain of command to file a complaint through communication of any types.
- (7) Damages amount sought is the face value of the Insurance Policy of Staples Copy & Print Decleration Insurance Coverage Values, and not enough the Plaintiff asks the defendant to use other insurance liability coverages Staple Copy and Print Center has. And the harassing customer information be provide as another civil action against the African American female or Staples is responsible for the customer harassment while on the Staple premise under premise liability communication intention to communicate without customer wanting to be fought or harassed by a store member and each of the employees pay check can be garnished for the amount damages \$500,000.00 five hundred thousand dollars for each Staple Copy and Print Store employee and the Staple Copy and Print Store damages \$800,000.000.00 eight hundred million dollars.

The Plaintiff is willing to mediate and settle the civil dispute for damages but not less than the idea of legal action cause damages fair market value includes face value of liability and other insurance policies

DEFENDANT ADDRESS

Attn: Legal Department General Counsel 500 Staples Drive Framingham, MA 01702.

Angela Nails

ANGELA NAILS
10708 EGMONT ROAD
SAVANNAH, GEORIGIA 31406

NOTICE OF SERVICE

United States Postal mail was used ~~June 18~~ ^{JULY 18}, 2025 to the address ~~600 Concord Street~~ ^{1 Court Street Way}

~~Boston~~ ^{Boston} ~~02210~~ ⁰²²¹⁰

~~Framingham, MA 01702~~, United District Court Clerk's Office.

Angela Nails

ANGELA NAILS
10708 EGMONT ROAD
SAVANNAH, GEORIGIA 31406